DATE: May 20, 1988

TO: Division File

FROM: Bob Carson PAC

SUBJECT: 2010300032 -- Winnebago County

Rockford/Rockford Products Plant #2

ILD 000805875 RCRA - Permits



I received a call from Roy Morris on 5/20/88 requesting two Part A application forms so that he could add a waste stream and a storage area. This modification to the Part A is apparently for Plant #2 because the address provided was 707 Harrison Avenue. Since I was the reviewer of their container storage area closure certification (approved 2/16/88) and their Part A withdrawal request (denied 2/18/88), and was aware that they had intended to revert to generator status, I inquired if their RCRA Part B permit had been called in. He told me that it had not been, and that they were undergoing closure.

According to Jim Moore, their Part B application was called in recently and is due on November 8, 1988. A modification of their Part A application may therefore not be possible unless the unit meets Part 724 standards (secondary containment, etc.) and is covered by a State Permit. When the Part A application comes in, the reviewer should check with CAZ to see how it should be handled.